

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION
NO. 05-11443-GAO

ETHAN THOMAS
Plaintiff,

VS.

NEW ENGLAND FAST FERRY OF
MASSACHUSETTS, LLC, NEW
ENGLAND FAST FERRY COMPANY, LLC,
and INTERLAKE LEASING IV, INC.,
Defendants.

JOINT SCHEDULING STATEMENT

Now come the parties, in the above captioned action, by and through their undersigned counsel, after conferencing pursuant to Local Rule 16.1(B) of the United States District Court, District of Massachusetts, hereby file this proposed Joint Scheduling Statement.

I. DISCOVERY

The parties propose the following discovery plan:

- A. The Plaintiff proposes that all factual discovery be completed by June 30, 2006. The Defendants propose that all factual discovery be completed by September 18, 2006;
- B. The Plaintiff proposes that his designation of experts and disclosure of expert information and reports pursuant to the Federal Rules of Civil Procedure be served by July 31, 2006. The Defendants propose that the Plaintiff's expert information be served by October 18, 2006.
- C. The Plaintiff proposes that Defendants' designation of experts and disclosure of expert information and reports pursuant to the Federal Rules of Civil Procedure be served by August 31, 2006. The Defendants propose that the Defendants' expert information be served by November 20, 2006.

- D. The Plaintiff proposes that all expert depositions be completed by September 30, 2006. The Defendants propose that all expert depositions be completed by January 7, 2007.
- E. Final Pretrial Conference to be scheduled after February 9, 2007.

II. MOTION SCHEDULE

In addition to the above, the parties propose the following motion schedule.

- A. Motions to amend the pleadings, to add parties or to set forth additional claims to be filed on or before December 31, 2005.
- B. The Plaintiff proposes that dispositive motions be filed by September 30, 2006. The Defendants propose that dispositive motions be filed by February 9, 2007 with Oppositions filed within fourteen (14) days as set forth in the Local Rules of this Court.

III. CERTIFICATION

The parties report that they have conferred with their clients pursuant to Local Rule 16.1(D)(3) and will independently file their Certificates of Compliance.

IV. TRIAL BY MAGISTRATE JUDGE

The parties do not consent to trial by a Magistrate.

V. SETTLEMENT

The plaintiff has tendered a written settlement demand to the defendants.

WHEREFORE, the parties pray that this Honorable Court approve the above proposed schedule.

Respectfully Submitted,

PLAINTIFF
LATTI & ANDERSON, LLP

DEFENDANT
CLINTON & MUZYKA, P.C.

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Dated: November 9, 2005

